

Message

From: Crowley, Matthew [Crowley.Matthew@epa.gov]
Sent: 10/26/2020 1:11:46 PM
To: Lowe, Kelly [Lowe.Kelly@epa.gov]
Subject: FW: Closed System Seed Treatment Exposure Study
Attachments: 49421402-XX.pdf

From: Keller, Nancy <Keller.Nancy@epa.gov>
Sent: Thursday, February 26, 2015 1:03 PM
To: Tadayon, Seyed <tadayon.seyed@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Crowley, Matthew <Crowley.Matthew@epa.gov>
Subject: RE: Closed System Seed Treatment Exposure Study

Here is the exposure study.

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From: Keller, Nancy
Sent: Thursday, February 26, 2015 12:58 PM
To: Tadayon, Seyed; Dawson, Jeffrey; Crowley, Matthew
Subject: Closed System Seed Treatment Exposure Study

Hi Seed Treatment Team,

I've had some time to get reacquainted with my abamectin history and I have sent my exposure study off to Versar for review (I've attached the TAF request for your reference).

Here's the background/update:

In 2010, Syngenta wanted to register abamectin on soybean seed, but our ORE was based on the old 2000 Helix study and there were risks of concern (DP365441, 3/11/2010). Since the product was already registered and used on cotton seed, we decided to ask for additional data. We placed 3 conditions of registration on the proposed soybean seed use:

1. a cleaner scenario survey for closed system treaters,
2. a dust-off study (along with protocol for review first), and
3. an exposure (dermal + inhalation) study for the use of abamectin on cotton seed (along with protocol for review first).

The protocol for dust-off study was submitted to HED in late July 2011.
We replied with comments on 11/15/2011.

The protocol for the exposure study was submitted to HED in October 2011.

We replied with comments on 12/28/2011.

Syngenta requested concurrence and a final blessing to begin the exposure study on 11/6/2012.
We replied on 11/13/2012 to go ahead with the study.

On 7/14/2015, we received all three final CORs (dust-off study, cleaner survey, and exposure study).

The attached document D394816 is the review of the exposure study protocol (12/28/2011) which outlines this entire situation in more detail. The actual exposure study MRID is 49421402 (too big to attach in this email).

Our next steps after Versar's review, are to see where the UEs fall out in comparison to the other studies in the monograph. Also, Dawson will be checking with AHETF to see if this study should be shared with all of the other members... Similarly, the cleaner survey will need to be considered when we finalize SOP15 assumptions (on throughput and hours associated with worker activities).

Please let me know if you have any additional questions. I'll attach the MRID in another email.

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